



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

MAR 13 2008

Mr. Jeffrey A. Leed
Leed Environmental, Inc.
Van Reed Office Plaza
2209 Quarry Drive, Suite C-35
Reading, PA 19609

Re: Comments on the Revised September 2007 Groundwater Monitoring Report
NL Industries Superfund Site, Pedricktown, NJ

Dear Mr. Leed:

The United States Environmental Protection Agency (EPA) has reviewed the February 2008 revision of the September 2007 Groundwater Monitoring Report (revised GWMR) which was submitted to EPA via e-mail on February 15, 2008. The revised GWMR was to address EPA's January 23, 2008 comments on the original September 2007 version of this GWMR. The GWMR summarizes the results of groundwater sampling activities conducted in April 2007 by CSI Environmental, LLC at the NL Industries, Inc. Superfund Site.

The list provided below contains comments on specific sections referenced in the revised GWMR. For each comment, please amend the revised GWMR accordingly.

1. Page 1, Section 1, Paragraph 3 and Page 13, Section 5, Paragraph 2:

- Page 1, Paragraph 3 states "Moreover, it is apparent that improving groundwater quality has lessened or eliminated a need for remedial actions specifically aimed at groundwater."
- Page 13, Paragraph 2 states "Therefore, the natural rate of improvement in groundwater quality is adequate and there is no apparent need for active groundwater remediation. Continued monitoring will suffice to document improving conditions and protection of human health and the environment."
- The selected remedy for groundwater is a pump and treat remedy, as described in the July 8, 1994 ROD. Although improved groundwater quality has been observed, this does not support the conclusions presented regarding the need for a remedy. The above bullet statements must be removed from the revised GWMR. The reevaluation of the groundwater remedy is being addressed in the Groundwater Focused Feasibility Study.

2. Page 2, Section 2.1, Paragraph 3: This paragraph references MNA and "injection of alkalinity" as alternatives to pump and treat that are being evaluated. In order to be consistent with the Groundwater Focused Feasibility Study, "injection of alkalinity" should be replaced with "reagent injection."

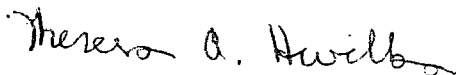
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3. Page 10, Section 4.4, Paragraph 4; Page 11, Paragraph 4; & Figures C-1 and C-2: The figures provided in Appendix C (C-1 & C-2) showing the former distribution of lead and cadmium are new additions to this report, but were provided as Figures 4 & 5 of the Draft Focused Feasibility Study (FFS) for groundwater. The following comments concerning these figures apply to both the FFS and this report:
- The area of the lead plume is smaller in size than what has been shown on isoconcentration maps in previous reports. Please justify this decrease and clarify how the plume isoconcentration lines were calculated for this report.
 - Data from 2004 should either be included in all figures, or an explanation as to why below freezing temperatures affected data quality should be provided. Did the samples freeze? If so, which ones? If data quality was thought to have been affected, why were samples not re-taken, and why was this not mentioned in previous reports?
4. Page 11, Paragraph 4: Cadmium and lead concentrations were averaged in order to perform mass calculations; however, there was no consistency in which wells were chosen to include in the average. For example, for cadmium mass calculations in 1988, only 5 out of the 10 wells sampled were averaged, and in 1998, 13 out of 21 wells sampled were averaged. Please explain the rationale behind this, as adding or deleting wells changes the value of the average concentration.
5. Page 13, Section 5, Paragraph 4: CSI recommended that wells 16 & 17 not be monitored because they "continually show no detection of lead and cadmium," but these wells have only been sampled twice (once in 1989 and once in 2007) and the 1989 samples were rejected after data validation. Please modify the sentence to state that the wells were non-detect in the most recent round of groundwater sampling. Due to their proximity to the residences, EPA requires that these wells continue to be sampled.
6. Page 13, Section 5, Paragraph 5: EPA agrees with the recommendation to abandon well MW-34.

Please update the revised GWMR to reflect the comments above and resubmit the amended report to EPA within 14 calendar days of receipt of this letter. If you have further questions or concerns regarding EPA's comments on the revised September 2007 GWMR, please do not hesitate to contact me.

Sincerely yours,



Theresa Hwilka, Project Manager
Southern New Jersey Remediation Section

cc: Steve Maybury, NJDEP

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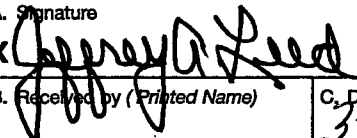
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Mr. Jeffrey A. Leed
Leed Environmental, Inc.,
Van Reed Office Plaza
2209 Quarry Drive, Suite C-35
Reading, PA 19609

2. Article Number

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